

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America  
 v.  
 Ismari Areli MARTINEZ-Camacho

Case No.

\_\_\_\_\_  
*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 17, 2019 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

8 USC 1324

*Offense Description*

Knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did transport and move and attempted to transport and move and conspired to transport and move such alien within the United States by means of transportation and otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

Continued on Affidavit

☒ Continued on the attached sheet.

\_\_\_\_\_  
 /S/Joshua Steele

\_\_\_\_\_  
*Complainant's signature*

Joshua Steele, Border Patrol Agent

\_\_\_\_\_  
*Printed name and title*

Sworn to before me and signed in my presence,

Date: June 19, 2019

\_\_\_\_\_  
*Judge's signature*

City and state: Laredo, Texas

Sam Sheldon, U.S. Magistrate Judge

\_\_\_\_\_  
*Printed name and title*

**AFFIDAVIT**

In support of Criminal Complaint

**UNITED STATES OF AMERICA****CRIMINAL COMPLAINT****V.**

Ismari Areli MARTINEZ-Camacho

Case Number:

1. On June 17, 2019 at approximately 4:40 a.m Border Patrol Agents were notified by radio communications that Webb County Sheriff's (WCSO) was seeking assistance of Border Patrol regarding a traffic stop with four possible undocumented aliens.
2. BPAs arrived at the scene on Highway 255, east of Highway 83 near Laredo, Texas. BPA proceeded to conduct an immigration inspection on the subjects. After a brief interview it was determined that the passengers were illegally in the United States. Subjects stated they were nationals of Mexico with no legal documents that would allow them to be or remain in the United States. BPA determined that the driver later identified as Ismari Areli Martinez-Camacho is a citizen of Mexico and was placed under arrest for suspected alien smuggling. Subjects were placed under arrest and transported to the Laredo North Checkpoint on Interstate Highway 35.
3. Martinez-Camacho was read her Miranda rights and signed form I-214. Martinez-Camacho confirmed she understood her rights and provided a sworn statement without legal counsel. Martinez-Camacho stated she used her vehicle to transport the illegal aliens and was going to be paid \$ 30.00 USD in gasoline. Martinez-Camacho stated she picked up subjects at a gas station in Laredo, Texas.
4. Ramiro Campos-Vazquez is being held as a material witness.
5. Campos-Vazquez stated he is a national of Mexico with no legal documents to be or remain in the United States. Campos Vazquez stated that he illegally entered the United States by crossing the Rio Grande River near Laredo, Texas on June 14, 2019. Campos-Vazquez claimed after he crossed the Rio Grande River he was taken to a house by Martinez Camacho. Campos-Vazquez claimed a few days later he was picked up by a grey sedan driven by Martinez-Camacho. Campos-Vazquez claims that all arrangements were made in Mexico and he paid a smuggler \$ 1,200.00 USD to be smuggled to San Antonio, Texas in United States. Campos-Vazquez was able to identify the driver at the checkpoint while his sworn statement was taken.
6. Pantaleon Ortiz-Jimenez is being held as a material witness.
7. Ortiz-Jimenez stated he was a national of Mexico with no legal documents to be or remain in the United States. Ortiz-Jimenez stated that he illegally crossed the Rio Grande River near Laredo, Texas on May 17, 2019. Ortiz-Jimenez stated that he was transported in a vehicle to a house by an unknown man where he stayed for several days. Ortiz-Jimenez stated that on the day of his arrest, he was picked up in the car driven by Martinez-Camacho. Ortiz-Jimenez claims that all arrangements and an unknown payment to be smuggled to North Carolina were made by his family from North Carolina. Ortiz-Jimenez was able to identify the driver at the checkpoint while his sworn statement was taken.
8. Alberto Diaz-Ramirez is being held as a material witness.
9. Diaz-Ramirez stated he is a national of Mexico with no legal documents to be or remain in the United States, and that he illegally entered the United States by crossing the Rio Grande River near Laredo, Texas on May 17, 2019. Diaz-Ramirez claimed he was taken to a house by an unknown man where he stayed for thirty days. Diaz-Ramirez claimed he was picked up by a grey sedan driven by Martinez-Camacho. Diaz-Ramirez claims that all arrangements were made in Mexico and he paid \$ 2,100.00 USD to be

smuggled to South Carolina in the United States.

10. Jose Tadeo-Trujillo stated he is a national of Mexico with no legal documents to be or remain in the United States, and that he illegally entered the United States by crossing the Rio Grande River near Laredo, Texas on May 17, 2019. Tadeo-Trujillo stated he was taken to a home by an unknown man where he stayed for thirty days. Tadeo-Trujillo stated a he was picked up by a grey sedan driven by Martinez-Camacho. Tadeo-Trujillo claims that all arrangements were made in Mexico and he paid \$ 2,100.00 USD to be smuggled to South Carolina in United States.

SUBSCRIBED and SWORN to before me on

19th day of June, 2019

\_\_\_\_\_  
Signature of Judicial Officer

/S/ Steele, Joshua Border Patrol Agent

\_\_\_\_\_  
Signature of Complainant